

Exhibit B

From: Josh Wackerly <josh@cicalapllc.com>
Sent: Monday, March 31, 2025 8:28 PM
To: Harvey, Patrick A.; Tal J Lifshitz; Levy, Lindsey; 'Bradley J. Demuth'; Scherr, Jason R.; Attridge, Elise M.
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Subject: Re: Insulin Pricing MDL - Meet and confer on Express Scripts discovery responses

[EXTERNAL EMAIL]

JR/Patrick-

Since the beginning of our custodian negotiations, Plaintiffs have requested that ESI provide a list of all relevant departments, an explanation of how those departments are structured, and a list of the relevant employees/titles within those departments who would be likely to have responsive information. ESI has refused to do so. Rather, ESI has only provided Plaintiffs with limited information related to the custodians that ESI has proposed. Thus, Plaintiffs have been left in the dark with respect to identifying additional custodians/departments beyond what ESI has offered. The likely result of ESI's lack of transparency is that as discovery proceeds, the parties will have to reopen custodian negotiations as ESI produces additional information regarding the relevant conduct and its departments/executives. Nonetheless, given the months of delay, discovery needs to move forward now and ESI has to begin making substantial productions.

Below is Plaintiffs' response/counterproposal to ESI's latest custodian offer. Plaintiffs' proposal is consistent with Judge Singh's order that you identify custodians for each department identified in Plaintiffs' February 28 Letter Brief for the entire relevant time period. Your current proposal does not meet these requirements. Please let us know by April 3 if you accept Plaintiffs proposal. If not, we will be submitting a letter brief with Judge Singh on April 4.

- Public Relations
 - ESI has offered Jennifer Luddy and Adam Hickey. Plaintiffs have identified additional custodians with responsive, non-duplicative information that served in the Public Relations department (ie Brian Henry, David Whitrap, etc) during the relevant time period. However, in spirit the compromise and to get discovery moving, **Plaintiffs will accept ESI's offer of only Jennifer Luddy and Adam Hickey, if ESI agrees to add Plaintiffs other requested custodians from the other departments.**

- Government Affairs
 - In contravention of Judge Singh's order, ESI has failed to offer any custodians in its Govt Affairs department. **Plaintiffs request Jonah Houts (2012-2018) and a custodian who served in Mr. Houts role from 2018-2023.**
- Investor Relations
 - Likewise, in contravention of Judge Singh's order, ESI has failed to offer any custodians in its Investor Relations department. **Plaintiffs request Benjamin Bier who served in this role from 2015-2019 and additional custodians who served in Mr. Bier's role from 2011-2015 and from 2019-2023.**
- Pharma Trade Relations
 - As we have made clear in our meet and confers and in our February 28 Letter Brief to the Court, Plaintiffs have identified numerous additional custodians from ESI's Pharma Trade Relations departments who have responsive, non-duplicative information from custodians ESI has offered. **Plaintiffs request Kelly Rhodus Tussing, Tracy Nelson, Thomas Abson, Raymond Jacobus, Sharon Bennett, Arefin Kabir, and Karen Kennedy.**
 - One additional note, it is Plaintiffs' understanding that Libby Newport was offered as an Ascent custodian given that all of her other non-Ascent roles during the relevant time period appear to be related to Specialty drugs. While we accept her as an Ascent custodian, we do not include her in the list below because she is not an Express Scripts custodian. Let us know if this is not correct.
- Finance
 - Plaintiffs' position is that there are two distinct types of Finance custodians — (1) custodians who engaged in Manufacturer Payment and formulary forecasting, analytics, and modeling and (2) custodians who compiled/analyzed profit and revenue information, constructed department budgets.
 - With respect to (1) forecasting/analytics/modeling, Express Scripts has offered Danielle Drzewucki. Plaintiffs agree that Danielle Drzewucki engaged in relevant work with respect to (1) from 2011-2015. It appears that Brian Debatin worked in this department from 2011-2015 also. Doug Willman worked in the same department as Ms. Drzewucki from 2013-2018 and engaged in similar, yet non-duplicative work. **Plaintiffs request that Express Scripts add Doug Willman and whoever served in Ms. Drzewucki's role from 2018-2023.**
 - It appears that Dan Gass provided formulary analytics/consulting from 2011-2017. **Plaintiffs also request Chris Muollo (formulary consulting) and request that Express Scripts identify a custodian who served in Mr. Gass's role from 2017-2023.**
 - Justin Lienemann, and Brian Debatin appear to be involved in (2) compiling/analyzing profit and revenue information, constructing department budgets. Justin Lienemann engaged in this work from 2013-2015. Brian Debatin engaged in this work from 2015-2018. **Plaintiffs request you identify custodian(s) who engaged in compiling/analyzing profit and revenue information, constructing department budgets from 2018-2023.**
- National Client Custodians
 - **Plaintiffs request Denise Pummel (Corporate Communications) who was directly involved in key national client communications throughout the relevant time period.**

Below is a complete list of Plaintiffs' custodian proposal (Plaintiffs additions in red). Please let us know by 4/3 whether ESI agrees with Plaintiffs proposal. If you would like to meet and confer before 4/3 please provide a few blocks of time availability. Plaintiffs reserve all rights.

1. Everett Neville (2011-present Trade Relations)
2. Ed Adamcik – (2011-2019 Trade Relations)
3. Jason Zilocchi (2011-2017 Trade Relations)
4. Amy Bricker (2011-2023 Trade Relations)
5. Todd Jeffrey (2011-2023 Trade Relations)
6. Tony Grillo (2011-2023 Trade Relations)
7. Harold Carter (2011-2023 Trade Relations)
8. Michael Rothrock (2017-2020 Trade Relations)
9. **Kelly Rhodus Tussing (2011-2023 Trade Relations)**
10. **Tracy Nelson (2011-2017 Trade Relations)**
11. **Thomas Abson (2011-2017 Trade Relations)**
12. **Raymond Jacobus (2011-2017 Trade Relations)**
13. **Sharon Bennett (2012-2019 Trade Relations)**
14. **Arefin Kabir (2016-2020 Trade Relations)**
15. **Karen Kennedy (2011-2020 Trade Relations)**
16. Jason Dohm (2011-2019 Formulary Development)
17. Jeff Eichholz (2011-2017 Formulary Development)
18. Shawn Davis (2016-2019 Formulary Development)
19. Julie Kitson (2011-2023 Formulary Development)
20. Adam Kautzner (2011-2023 Formulary Development)
21. Jeannette Novatski (Formulary Development)
22. Danielle Drzewucki (2011-2015 Finance - forecasting, analytics, and modeling)
23. **Doug Willman (2013-2018 Finance - forecasting, analytics, and modeling)**
24. **Finance custodian(s) - forecasting, analytics, and modeling - 2018-2023**
25. Dan Gass (2011-2017 Finance - formulary analytics/consulting)
26. **Chris Muollo (2011-2017 Finance - formulary analytics/consulting)**
27. **Finance custodian(s) - formulary analytics/consulting - 2017-2023**
28. Justin Lienemann (2013-2015 Finance - profit/revenue/budget)
29. Brian Debatin (2015-2018 Finance - profit/revenue/budget)
30. **Finance custodian(s) - profit/revenue/budget - 2018-2023**
31. Andrew Behm (2011-2023 Clinical)
32. Amy Gross (2011-2023 Clinical)
33. Nancy Pehl (Clinical)
34. Steven Miller (2011-2023 Clinical)
35. Glen Stettin (2011-2023 Clinical)
36. William Cahill (VP Sales)
37. Jennifer Luddy (2011-2023 Public Relations)
38. Adam Hickey (Public Relations)
39. **Jonah Houts (2012-2018 Govt Affairs)**
40. **Govt Affairs Custodian(s) 2018-2023**
41. **Benjamin Bier (Investor Relations 2015-2019)**
42. **Investor Relations custodian(s) 2011-2015**
43. **Investor Relations custodian (s) 2019-2023**
44. **Denise Pummill (Corporate Communications 2011-2023)**

Regards,

Josh Wackerly